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May 19, 2015

VIA ECF

The Honorable Magistrate Andrew T. Baxter
United States District Court for the Northern District of New York
James M. Hanley Federal Building
100 S. Clinton St.
Syracuse, New York 13261

Re: *Barbara Driggers et al. v. Gannett Co., Inc. et al.*
Case. No. 5:15-cv-0604(GLS)(ATB)

Dear Judge Baxter:

This firm represents Defendants Gannett Co., Inc., Gannett Satellite Info Network, Ithaca Journal, and Elmira Star-Gazette (collectively, "Defendants") in the above-referenced matter. Defendants responsive pleading is due on May 26, 2015. We write to respectfully request a 30 day extension of time for Defendants to respond to the Complaint, to and including June 25, 2015.

This is the Defendants' first request for an extension of time to respond to the Complaint. It is made in good faith, and not for the purpose of causing undue delay. This request is being made in good faith to allow the parties to focus their attention and resources on reaching a non-litigated resolution and avoid possible motion practice, and not to cause undue delay. No status conferences or hearings will be affected by this request. Plaintiff's counsel consents to this request.

We thank the Court for its time and consideration of this request.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Howard M. Wexler
Howard M. Wexler

cc: Edward Kopko Esq. (via ECF)
Camille A. Olsen Esq. (via email)
Richard Lapp Esq. (via email)